

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**GEOVANY DOMINGUEZ ESCOBAR, and
JORDAN MORENO,**

Defendants.

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CRIMINAL NO. PWG 21-059

GOVERNMENT’S MEMORANDUM IN AID OF SENTENCING

On August 4, 2022, defendant Jordan Moreno (“Moreno”), pursuant to a plea agreement with the government, pleaded guilty to one count of Conspiracy to Kidnap in violation of 18 U.S.C. § 1201(c). He is scheduled to be sentenced on December 2, 2022. Likewise, on August 16, 2022, defendant Geovany Dominguez-Escobar (“Escobar”) pleaded to the same charge and is scheduled to be sentenced on November 29, 2022. For the reasons below, and consistent with application of the U.S. Sentencing Guidelines, the government recommends that this Court sentence both defendants to 25 years’ imprisonment, followed by 5 years of supervised release.

Criminal Conduct

As detailed in the plea agreements and PSRs in this case, the criminal conduct at issue this case is both abhorrent and senseless. The kidnapping victim, 19 year-old Sara Villatoro, was known to both defendants as the girlfriend of one of their fellow 18th Street Gang clique members. As noted in Moreno’s PSR, at ¶ 54, Miss Villatoro was a frequent guest at his mother’s home and Moreno had previously helped Villatoro secure lodging and food. On November 21, 2019, the two defendants kidnapped and murdered her because they and fellow 18th Street gang members suspected that she was socializing with members of the rival MS-13 gang.

Escobar, then a 24-year old native of El Salvador who had arrived in the United States in 2012, and Moreno, a 21-year old native of Nicaragua who had lived in the United States since arriving with his mother as a child, had each been 18th Street members for several years. Escobar was the nominal leader of the gang's Tiny Locos Sureños clique (perhaps a dozen members), but Moreno was a recognized "homeboy" in the group and the two communicated as relative equals.

No later than October 2019, the two had agreed to kill Sara Villatoro, identified a location to execute her, and developed a plan to lure her to her death. Escobar began using Facebook to communicate with Villatoro under the ruse that he wanted to develop a social relationship with her. Ultimately, over that social media platform, the two agreed to meet on November 21, 2019. Escobar, driving Moreno and two more junior 18th Street associates in his wife's car, picked up Villatoro in Washington DC at 11:17 pm, and began driving to a wooded park in rural Montgomery County near the Frederick County line.

After they arrived, Moreno and at least one of the junior gang members walked into the woods with Miss Villatoro, who was under the impression that they were going to smoke marijuana there. Once inside the woodline, the youngest gang member, then aged 16, drew a .38 caliber revolver from his waistband and shot Miss Villatoro in the side of her face, but that single shot failed to kill her immediately. Moreno then took the weapon and fatally shot her in the forehead. The men left her body in the woods, returned to Escobar's car, and departed the area. Sara Villatoro's body was found by a park visitor a week later.

Sentencing Recommendation

Taking into account the § 3553(a) factors, including information contained in the defendants' Pre-Sentence Reports regarding their background and family circumstances, the details of the offense, as well as the need to protect the community from these defendants, deter

them and others from committing future crimes, and the need to promote respect for the rule of law and provide just punishment, the government submits that a sentence of 25 years, followed by 5 years' supervised release (likely inactive, since both defendants will likely be removed to their native countries upon release) is appropriate in this case. Consistent with the plea agreements in this case, the government seeks sentences concurrent with those imposed for Sara Villatoro's murder by the Circuit Court for Montgomery County. In defendant Moreno's case, he has already been sentenced by the state to 50 years' imprisonment and the government recommends that this Court affirmatively impose a concurrent sentence. The government expects that defendant Escobar will be sentenced identically by the Circuit Court for Montgomery County following his plea there, presently set for December 9, 2022.

The government acknowledges that both defendants were relatively young at the time of the offense and had difficult backgrounds. Due to circumstances not within their control or of their doing, both found themselves living a precarious existence in the United States due to their legal status and language barriers, which made them vulnerable for recruitment into gang life and subsequent indoctrination.

That said, their victim was, if anything, even more vulnerable. The oldest of her mother's three children, Sara Villatoro's young life was snuffed out violently and pointlessly—her only “crime” was offending gang members' sense of propriety. Her kidnapping and subsequent murder demands significant punishment that will deter others from committing similar savage, pointless violent acts and isolate these particular offenders from the community for a long time.

25 years' imprisonment is not the lowest end of the range provided for by offense level 40 and criminal history category I, which produces a recommended range of imprisonment of 292-365 months. Given the higher state sentences for the murder involved here, however, the

government anticipates that the principal purpose of this Court's sentences for the kidnapping conspiracy is to undergird the state sentences against collateral attack or an unexpectedly early parole decision, for which the defendants will presently be eligible at 50% of sentence completion – i.e., 25 years.

Respectfully submitted,

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